

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR THE
COUNTY OF LOS ANGELES
Department of Children and Family Services
Conducted
September 22 thru September 29, 2008**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 6-70
Sacramento, CA 95814
(916) 654-2107**

**Reviewer
James Urquizo**

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Los Angeles County Department of Children and Family Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on September 22 thru September 29, 2008 with an introductory meeting held with Mattie Bryant, Civil Rights Coordinator. An exit interview was held with Mattie Bryant and County staff on September 29, 2008 to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
<u>Dept of Children and Family Services Vermont Corridor</u>	8300 S. Vermont Ave, Los Angeles, CA 90044		Spanish
<u>Dept of Children and Family Services El Monte</u>	4024 N. Durfee Ave, El Monte, CA 91732		Spanish
<u>Dept of Children and Family Services Santa Fe Springs</u>	10355 Slusher Dr., Santa Fe Springs, CA 90670		Spanish
<u>Dept of Children and Family Services Belvedere Office</u>	5835 S. Eastern Ave, Los Angeles, CA 90040		Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2008 Annual Civil Rights Plan submitted by the County.

- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Children Social Workers	25	21
Receptionist/Screeners	5	4
Total	30	25

An additional xxx interviews were scheduled but were not conducted due to staff unavailability.

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	11
Non-English or limited-English speakers' case files reviewed	69
Languages of clients' cases	Spanish, Vietnamese, Chinese, Armenian, Korean, Russian

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			
Does the county have extended hours to accommodate clients?	X			
Can applicants access services when they cannot go to the office?	X			
Does the county ensure the awareness of available services for individuals in remote areas?	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			
Was the Pub 13 available in large print, audiocassette and Braille?			X	All offices had PUB 13 in threshold languages, but not all offices had all 14 languages available. PUB 13 Audio was not always available.
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			

B. Corrective Actions

Informational Element	Corrective Action Required
Auxiliary aids	Los Angeles County shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4

C. Recommendation

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A1. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 8300 S. VERMONT, LOS ANGELES

Facility Element	Findings	Corrective Action
Parking	Eight disabled spots are too narrow at 8'7" wide.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p. 135

	Eight disabled spots are too narrow at 17' long.	Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p. 135
Parking	One van disabled spot is too short at 8'7" wide. One van disabled spot is too short at 17' long.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p. 135
Parking	Persons with disabilities are forced to go behind cars. Parking spots are too far from the front entrance – clients have to walk behind nine cars.	Located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1)) p. 131
Exterior entrance	Directional signage at accessible entrance is not in threshold language: 1. This Facility Contains Chemicals. Including... 2. Hours of Operation...	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants /recipients may request aid or services in their primary language. (Div 21.107-212)
Client Lobby	Two signs in the Lobby are not in threshold language: 1. Public restrooms 2.All DCFS visitors please announce your presence	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants /recipients may request aid or services in their primary language. (Div 21.107-212)

Client Lobby	"And Justice for All" Poster (# 475B) Not posted.	Posters on nondiscrimination provided by CDSS shall be prominently displayed in all waiting rooms and reception areas. The county welfare department shall place on the posters the name, office telephone number, and office address of the person(s) in the CWD who is responsible for processing discrimination complaints. Posters dealing specifically with nondiscrimination in the Food Stamp Program shall be prominently posted in all certification and issuance offices (Div 21-107.211)
Client Lobby	Pub 13 Audio not available.	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). (Div 21-107.221)
Men's Bathroom	Force to open door excessive at 6 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Women's Bathroom	Force to open door excessive at 7 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

A2. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 4024 N. DURFEE, EL MONTE

Facility Element	Findings	Corrective Action
Parking	Two “unauthorized parking” signs at entrance to off-street accessible parking need replacement. Lettering is unreadable.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17” by 22” min. in size with lettering 1” min. high, stating: “Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner’s expense. Towed vehicles may be reclaimed at _____ or by telephoning _____.” (CA T24 1129B.5) p. 133
Parking	There are NO Van Accessible spaces.	One in every 8 accessible spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.4.2, ADA 4.1.2(5)(b)) pp. 135, 136
Parking	There are no correct freestanding signs on the five spots. Some spots have signs with incorrect language, and some with incorrect height. Some spots do not even display a sign.	Sign height shall be 80” minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133
Parking	Two disabled parking spot access aisles have a 7’ encroachment into the	Length of parking space shall be at least 18’ long, 9’ wide. (CA T24 1129B.4.1) p. 135

	aisle. (One in the front and another in the back parking spots.)	Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135
Parking	There are no Van-Accessible signage mounted below the symbol for accessibility.	Van-accessible spaces shall have a sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space. (CA T24 1129B.5, ADA 4.6.4) p. 133
Parking	There is no "No Parking" painted on pavement in access aisles.	The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135
Parking	Persons with disabilities are forced to go behind cars.	Persons with disabilities shall not be forced to go behind parked cars except their own. (CA T24 1129B.4.3) (<i>hardship exception, p. 136</i>)
Parking	There are no parking access aisles connected to the accessible path of travel.	Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.4.3, ADA 4.6.3) p. 136 Walkways minimum 48" (CA T24 1133B.7.1) p. 160
Parking	Parking is not located as close as possible to the front entrance. Three spots, on the side of the building, require clients to travel the length of the building to the front entrance.	Located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1)) p. 131

Exterior entrance	No international symbol of accessibility at entrance.	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p> <p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355</p>
Exterior entrance	There is no directional signage directing clients to accessible front entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353
Exterior entrance	Front entrance doors - force to open door excessive at 6 lbs on the left and 9 lbs on the right.	<p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(1)) p. 195</p>
Client lobby	The lobby has an accessible counter at 40."	Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p. 349

Client lobby	"Everyone is Different, but Equal under the Law" poster is not posted.	Posters on nondiscrimination provided by CDSS shall be prominently displayed in all waiting rooms and reception areas. The county welfare department shall place on the posters the name, office telephone number, and office address of the person(s) in the CWD who is responsible for processing discrimination complaints. Posters dealing specifically with nondiscrimination in the Food Stamp Program shall be prominently posted in all certification and issuance offices. (Div 21-107.211)
Client lobby	Pub 13 in audio is not available.	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). (Div 21-107.221)
Men's Restroom	Force to open door excessive at 6 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Women's Restroom	Force to open door, excessive at 7 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

A3. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 10355 SLUSHER DRIVE, SANTA FE SPRINGS

Facility Element	Findings	Corrective Action
Parking	Incorrect “unauthorized parking” signage at entrance to off-street accessible parking (at the two entry points to the parking lot).	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17” by 22” min. in size with lettering 1” min. high, stating: “Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner’s expense. Towed vehicles may be reclaimed at _____ or by telephoning _____.” (CA T24 1129B.5) p. 133
Parking	One accessible disabled spot is too narrow at 8’3” wide (rear of building).	Length of parking space shall be at least 18’ long, 9’ wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18’ x 5’ minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p. 135
Parking	Two accessible disabled spots are too short at 17’8.” long (front of building).	Length of parking space shall be at least 18’ long, 9’ wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18’ x 5’ minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p. 135

Parking	One Van-Accessible space, access aisle, is too narrow at 5'6" wide (end of building).	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135
Parking	Two disabled parking spots are not located as close as possible to entrance (parking spots located on the right side of the building to the far right of building 50 to 60 yards from front entrance).	Located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1)) p. 131
Parking	Disabled parking spots are not close to the front entrance.	Accessible parking spaces shall be located as near as practical to a primary entrance and shall have required spaces according to (CA T24 1129B.1, ADA 4.1.2(5)(a)) p. 132
Main entrance	Force to open front main door, excessive at 14 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195 Force to open fire door, minimum allowable not to exceed 15 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(1)) p. 195

Lobby	No Audio Pub 13 is available	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). (Div 21-107.221)
Men's Bathroom	Paper towel dispenser is too high at 52.5". NOTE: There is a second paper towel dispenser at appropriate height – NO PAPER	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269
Women Bathroom	Paper towel dispenser is too high at 52.5". NOTE: There is a second paper towel dispenser at appropriate height – NO PAPER	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269

A4. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 5835 S. EASTERN, LOS ANGELES

Facility Element	Findings	Corrective Action
Parking	There are no Van-accessible parking spots.	One in every 8 accessible spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.4.2, ADA 4.1.2(5)(b)) pp. 135, 136
Parking	There is no Van-accessible parking signage.	Van-accessible spaces shall have a sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space. (CA T24 1129B.5, ADA 4.6.4) p. 133
Main Entrance	There is no Disabled symbol at entrance to building.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353
Main Entrance	There is no directional signage to front entrance.	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants /recipients may request aid or services in their primary language. Div 21.107-212

Main Entrance	There is no ISA sign, at main or alternate entrances.	Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355
Main Entrance	Force to open front main door - excessive at 15 lbs (left) and 15 lbs (right).	Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355
Lobby	Accessible counter too high at 40.”	Height of accessible tables or counters is between 28” – 34” from floor finish. (CA T24 1122B.4, ADA 4.32.4) p. 349
Lobby	Lobby poster: “Everyone is Different, but Equal under the Law” is not posted.	Posters on nondiscrimination provided by CDSS shall be prominently displayed in all waiting rooms and reception areas. The county welfare department shall place on the posters the name, office telephone number, and office address of the person(s) in the CWD who is responsible for processing discrimination complaints. Posters dealing specifically with non-discrimination in the Food Stamp Program shall be prominently posted in all certification and issuance offices. (Div 21-107.211)

Lobby	Pub13's in other required languages not available behind the counter. Receptionists were unaware of OTHER language Pub 13's required.	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). Current: 05/01 or 01/04 (Div 21- 07.221)
Lobby	No Audio Pub 13 is available.	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). (Div 21- 107.221)
Lobby	Four interview room signs are too high at 64" to the center of the sign.	Where permanent identification is provided for rooms and spaces, signs are installed on the wall adjacent to the latch outside of the door. (CA T24 1117B.5.7, ADA 4.30.6) p. 357 Mounting height is 60" above the finished floor to the center of the sign. (CA T24 1117B.5.7, ADA 4.30.6) p. 357

Emergency Alarms	No Visual Emergency Alarm	If emergency warning systems are required, they shall activate a means of warning the hearing impaired. (CA T24 1114B.2.4, ADA 4.28.1) p. 221
Elevators	No Disabled International Symbol of Accessibility at elevator entrance.	Entrances that are accessible to and usable by persons with disabilities are identified with at least 1 International Symbol of Accessibility. Additional directional signs using the symbol are visible along approaching pedestrian ways. (CA T24 1117.B.5.8.1.2) p. 229
Men's Bathroom	<p>No wall accessible signage.</p> <p>There are two signs on the door: One is correct at 60" and the other can be placed on wall.</p>	<p>Door sign and wall sign shall be 60" above the floor. (to middle)</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>
Men's Bathroom	Force to open door. excessive at 9 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

Men's Bathroom	There are two paper towel dispensers that are too high: one at 45" high and the other at 46" high.	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269
Men's Bathroom	There are two toilet tissue dispensers that are too far from edge of toilet seat: one is 18" and the other is 21".	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp. 275, 269 Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269
Women's Bathroom	No wall accessible signage. There are two signs on the door: One is correct at 60" and the other can be placed on the wall.	Door sign and wall sign shall be 60" above the floor. For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263 Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263
Women's Bathroom	Force to open door excessive at 7 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

Women's Bathroom	There are two paper towel dispensers that are too high: one at 45" high and the other at 46" high.	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269
Women's Bathroom	There are two toilet tissue dispensers that are too far from edge of toilet seat: one is 19" and the other is 18".	<p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp. 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269</p>

V. Photographs



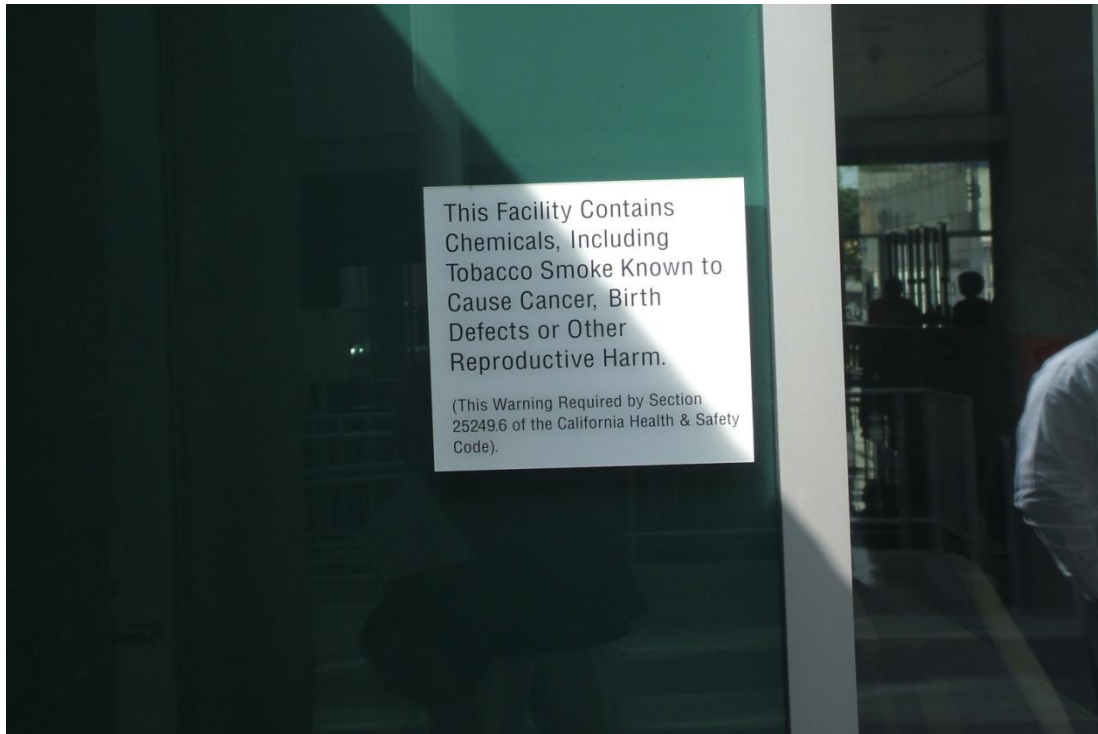
8300 S. VERMONT AVE, LOS ANGELES
Monday September 22, 2008



Persons with disabilities are forced to go behind cars



Signage not in threshold language



Signage not in threshold language



Signage not in threshold language



4024 N. DURFEE, EL MONTE

Tuesday, September 23, 2008



Unauthorized parking sign unreadable



Incorrect freestanding signs on five parking spots



Incline ramp encroaches into access aisle



There is no "No Parking" painted on pavement in access aisles.



There is no parking access aisles connected to the accessible path of travel



Unauthorized parking sign is not completely readable



Persons with disabilities are forced to go behind cars.



Incline ramp encroaches into access aisle



Signage not in threshold language



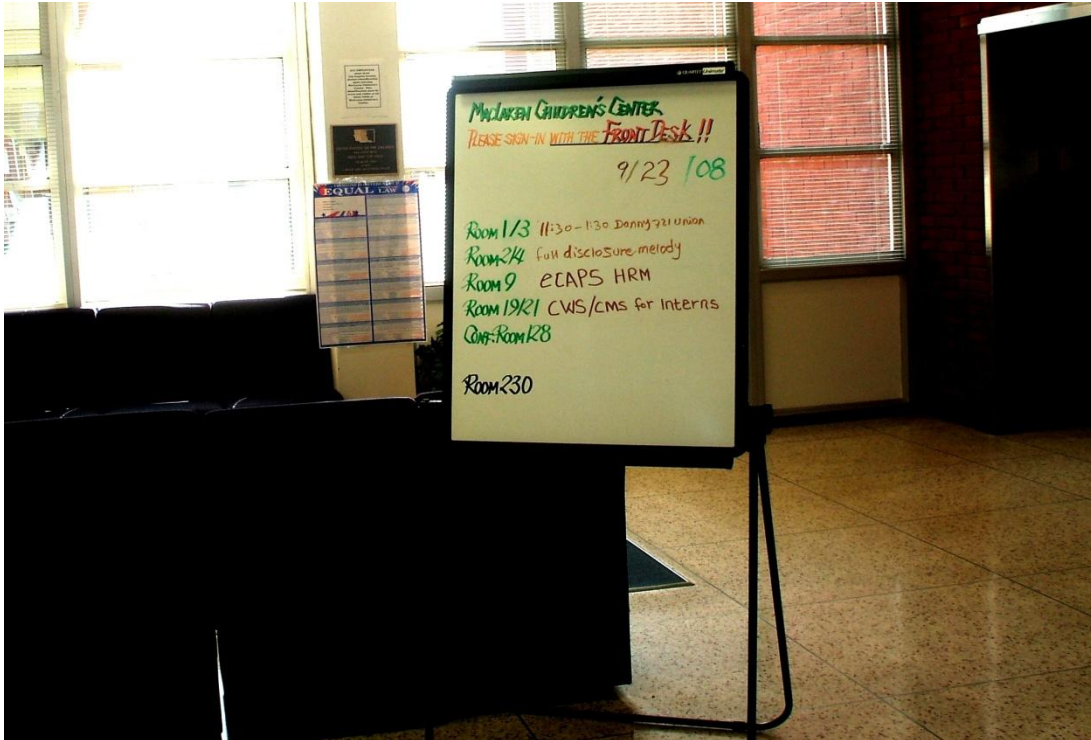
Signage not in threshold language



Signage not in threshold language



Signage not in threshold language



Signage not in threshold language



Signage not in threshold language



Signage not in threshold language



Signage not in threshold language



Signage not in threshold language



10355 SLUSHER DR, SANTA FE SPRINGS
Wednesday, September 24. 2008



Incorrect “unauthorized parking” signage at entrance



Incorrect “unauthorized parking” signage at entrance



Incorrect “unauthorized parking” signage at entrance



Signage not in threshold language



Signage not in threshold language



5835 S. EASTERN AVE, LOS ANGELES

Thursday, September 25, 2009



There is no ISA sign, at main or alternate entrance



Signage not in threshold language



Signage not in threshold language



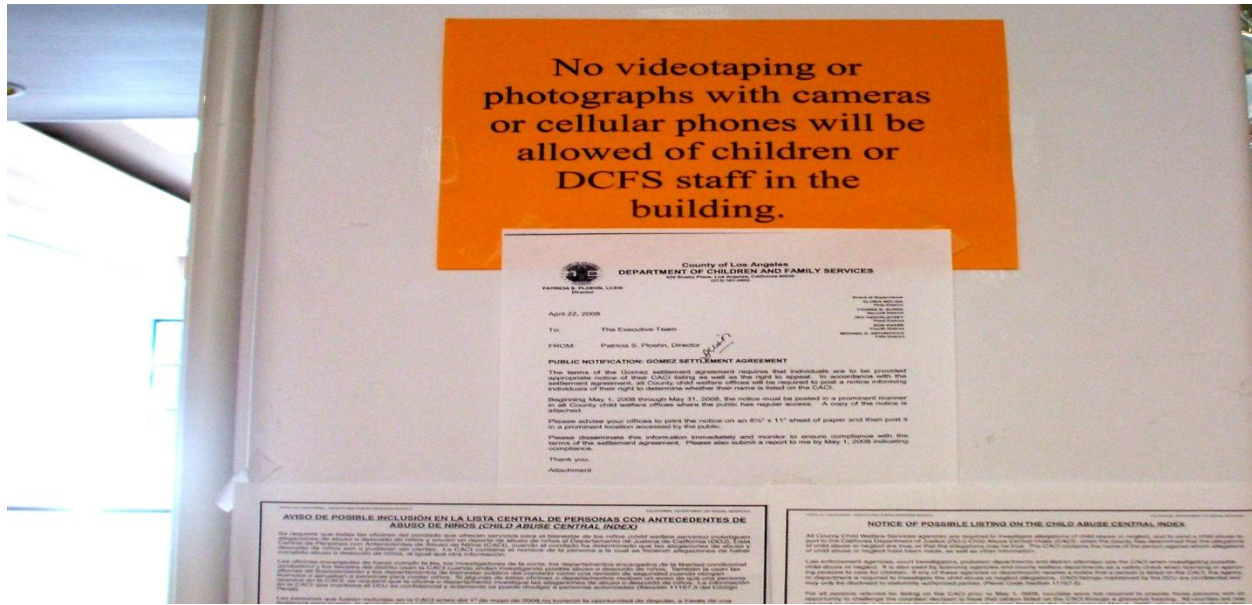
Signage not in threshold language



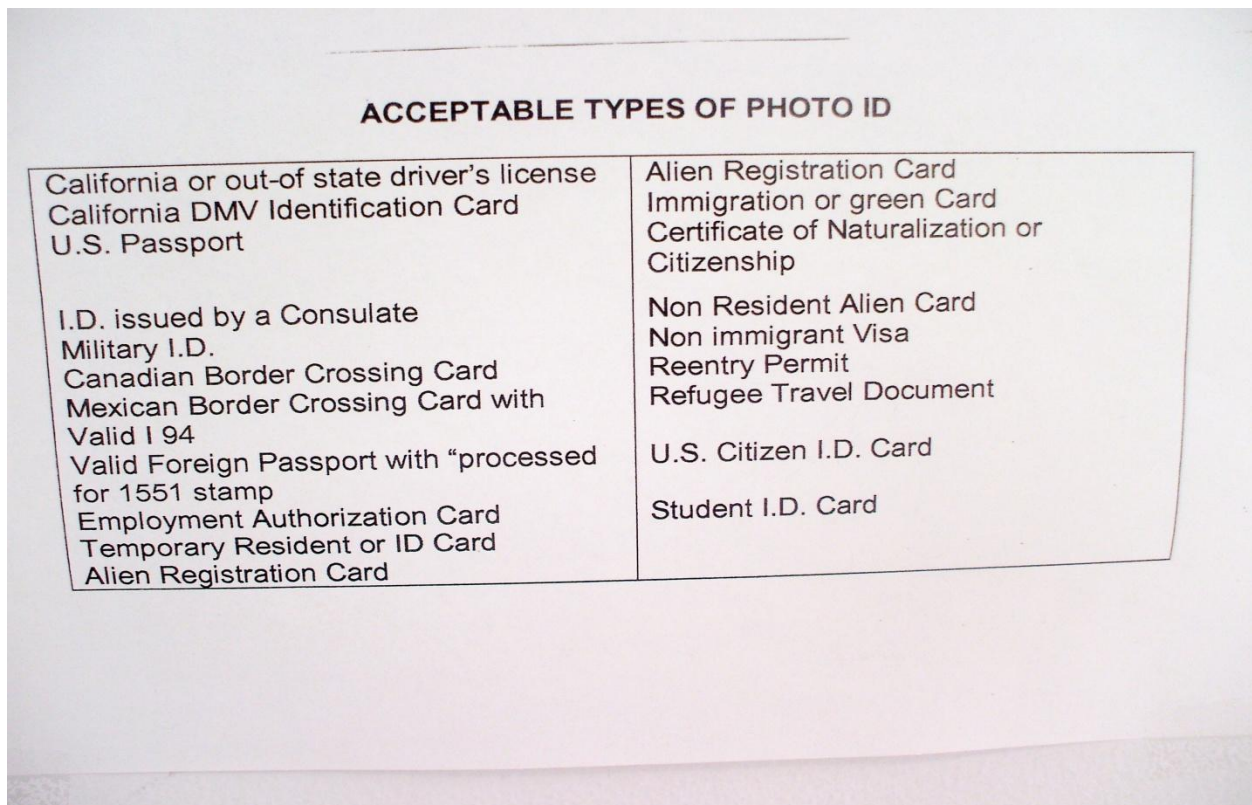
Signage not in threshold language



Signage not in threshold language



Signage not in threshold language



Signage not in threshold language



Signage not in threshold language



**Signage not in threshold language
(In Use – Do Not Disturb)**



NOTE: Two signs on door. One is ok at 60" to middle of sign, the other sign can be moved to the wall as required.



NOTE: Two signs on door. One is ok at 60" to middle of sign, the other sign can be moved to the wall as required.



Men's bathroom. Two toilet tissue dispensers are too far from toilet



Women's Bathroom. Two toilet tissue dispensers are too far from toilet

VI. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			
Does the county use a primary language form?	X			
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			

Question	Yes	No	Some-times	Comments
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			
Is there a delay in providing services?		X		Interpretative Services are expeditious and professional.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		The County has a policy to not allow minor as Interpreters.
Does the county allow the client to provide his or her own interpreter?	X			Communication problems are explained and a release form is utilized regularly.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			

Question	Yes	No	Some-times	Comments
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			

VII. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services
Ethnic origin documentation	Documented well, CWS/CMS is utilized well
Primary language documentation	Documented well, CWS/CMS is utilized well
Method of providing bilingual services and documentation	Documented well, CWS/CMS is utilized well
Client provided own interpreter	<u>Random</u> documentation of Interpreter usage
Method to inform client of potential problem using own interpreter	<u>Random</u> documentation of Interpretative problems
Release of information to Interpreter	Release of information form was visible, but not used consistently
Individual's acceptance or refusal of written material offered in primary language	No evidence of this happening
Translated notice of actions (NOA) contain translated inserts	Documented well, CWS/CMS is utilized well
Method of identifying client's disability	Documented well, CWS/CMS is utilized well
Method of documenting a client's request for auxiliary aids and services	Documented well, CWS/CMS is utilized well

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	Los Angeles County must ensure that proper documentation is kept in the file that identifies all the required elements.

VIII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			

Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			Not on a regular basis
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	Los Angeles County shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1
Cultural Awareness Training	Los Angeles County shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff has an understanding of and sensitivity to the various cultural groups in the county's population. Div. 21-117.2

IX. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?		X		Staff Interviewed have difficulty knowing the difference.
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

Element	Corrective Action
Discrimination Process	Los Angeles County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203

X. CONCLUSION

The CDSS found the County of Los Angeles Department of Children and Family Services in satisfactory compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. The civil rights program was visible in the main reception areas with translated signage and an overall “climate” of participant service. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

Although the offices visited in the County of Los Angeles are providing appropriate client support, there remain issues with documentation of language services by bilingual workers. Other documentation issues have been addressed and upon implementation of newly published procedures outlined in Policy Implementation Memorandum No. 08-04, these issues will be resolved.

It should be noted that there was exceptional cooperation and coordination.